INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
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Indianapolis, Indiana 46206-6015
(317) 232-8603
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August 22, 2003

TO: Interested Parties / Applicant

RE: Sonoco Flexible Packaging, Inc. / A 081-17977-00005

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 8/11/03

August 22, 2003

Mr. Jeff Cheak
Sonoco Flexible Packaging, Inc.
P.O. Box 188, U.S. 31 North
Edinburgh, Indiana 46124

Re: 081-17977
First Administrative Amendment to
Part 70 081-7183-00005

Dear Mr. Cheak:

Sonoco Flexible Packaging, Inc. was issued a Part 70 permit on July 1, 2003 for a stationary commercial printing operation that produces coated and laminated printed packaging for food products. A letter requesting a change was received on July 29, 2003, which will incorporate the new 8.7 million British thermal units per hour (mmBtu/hr) thermal oxidizer into the Part 70 permit. This thermal oxidizer will control emissions from the existing 8RL press line and 6X extrusion line. The 24 mmBtu/hr oxidizer currently controlling 8RL press line and 6X extrusion line will be reconfigured to control emissions from 6RL and both of the degreasers. The 11.2 mmBtu/hr oxidizer currently controlling line 6RL will be removed. The additional emissions from the 8.7 mmBtu/hr oxidizer will be at less than exempt levels (see Page 1 of 1 Appendix A). The change will not result in new applicable requirements, nor affect existing conditions in the Part 70 permit, thus it qualifies as a descriptive change only. Therefore, the Part 70 permit will be administratively amended, pursuant to 326 IAC 2-7-11(a)(7), as follows (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 01, installed in 1997.

(b) One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 02, installed in 1998.

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~11.2~~ **24** MMBtu/hr, exhausting to stack S11.

(d) One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack ~~13~~ **11**.

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station,

identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~24.0~~ **8.7** MMBtu/hr, exhausting to stack 13.

(f) One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack ~~13~~ **11**.

(g) One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units:

(1) One (1) extrusion laminator

(2) One (1) coating/adhesive lamination deck

(3) One (1) coating deck

(4) Two (2) coating station dryers

(h) One (1) Tower 7 coating booth, identified as EU 202, installed in 1970, product being coated is paper, picture mounting, application method used is meyer rod coating, exhausting to stacks 22, 23, 24, 25, and 26.

(i) One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~24.0~~ **8.7** MMBtu/hr exhausting to stack 13. EU 204 consists of the following units:

(1) through (3) no changes

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~11.2~~ **24** MMBtu/hr, exhausting to stack 11.

One (1) 11-station 8RL rotogravure printing press with adhesive coating/lamination station, identified as EU 103, installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a total permanent enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~24.0~~ **8.7** MMBtu/hr, exhausting to stack 13.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) cold cleaning degreaser unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack ~~13~~**11**.

One (1) cold cleaning degreaser unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack ~~13~~**11**.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

SECTION D.4 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units: 1) One (1) extrusion laminator; 2) One (1) coating/adhesive lamination deck; 3) One (1) coating deck; 4) Two (2) coating station dryers.

One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of ~~24.0~~ **8.7** MMBtu/hr exhausting to stack 13. EU 204 consists of the following units: 1) Two (2) extrusion laminators; 2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour; 3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD
cc: File - Johnson County
U.S. EPA, Region V
Johnson County Health Department
Air Compliance Section Inspector - Vaughn Ison
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Sonoco Flexible Packaging
6502 S. U.S. Highway 31
Edinburgh, Indiana 46124

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T081-7183-00005	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 1, 2003 Expiration Date: July 1, 2008
First Administrative Amendment No.: 081-17977	Affected Pages: 5, 6, 27, 33, 36
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: August 22, 2003

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary commercial printing operation that produces coated and laminated printed packaging for food products.

Responsible Official:	Jeff Cheak
Source Address:	6502 S. U.S. Highway 31, Edinburgh, IN 46124
Mailing Address:	P.O. Box 188, U.S. 31 North, Edinburgh, IN 46124-0188
General Source Phone Number:	(812) 526-5511, ext. 224
SIC Code:	2671, 2754, 2759
County Location:	Johnson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) boiler, fueled by natural gas, backup fuel is propane, identified as Boiler EU 11 (No. 1), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 01, installed in 1997.

(b) One (1) boiler fueled by natural gas, backup fuel is propane, identified as Boiler EU 12 (No. 2), having a heat input capacity of 20.925 MMBtu/hr, exhausting to stack 02, installed in 1998.

(c) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 101 (6RL), installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24 MMBtu/hr, exhausting to stack S11.

(d) One (1) cold cleaner degreasing unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

(e) One (1) 11-station rotogravure printing press with adhesive coating/lamination station, identified as EU 103 (8RL), installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a permanent total enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr, exhausting to stack 13.

(f) One (1) cold cleaner degreasing unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

(g) One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units:

(1) One (1) extrusion laminator

(2) One (1) coating/adhesive lamination deck

(3) One (1) coating deck

(4) Two (2) coating station dryers

(h) One (1) Tower 7 coating booth, identified as EU 202, installed in 1970, product being coated is paper, picture mounting, application method used is meyer rod coating, exhausting to stacks 22, 23, 24, 25, and 26.

(i) One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units:

(1) Two (2) extrusion laminators

(2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour

(3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 (Cold cleaner degreasing units, EU 102 and EU 105, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether. EU 102 is limited to 12 cycles per day and 350 days per year.) [326 IAC 8-3].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) 11-station 6RL rotogravure printing press with adhesive coating/lamination station, identified as EU 101, installed in 1987, having a maximum line speed of 1000 ft/min and a maximum printing width of 52 inches, equipped with adhesive applicator, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 24 MMBtu/hr, exhausting to stack 11.

One (1) 11-station 8RL rotogravure printing press with adhesive coating/lamination station, identified as EU 103, installed in 1995, having a maximum line speed of 1000 ft/min and a maximum printing width of 51.5 inches, equipped with adhesive applicator, enclosed in a total permanent enclosure, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr, exhausting to stack 13.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Requirements [326 IAC 2-2-3]

(a) Pursuant to SSM 081-12310-00005, issued on November 14, 2000, the total amount of organic solvent delivered to 6RL rotogravure printing press (EU 101) shall not exceed 701.88 tons per consecutive 12-month period, with compliance determined at the end of each month.

(b) Pursuant to CP 41-1704-00005, issued on September 22, 1988, the VOC emissions from the 6RL rotogravure printing press (EU 101) shall be controlled by a thermal oxidizer with an overall control efficiency of 76%. Therefore, this constitutes the best available control technology (BACT) requirement in 326 IAC 2-2-3 (PSD rule: best available control technology (BACT)) which satisfies the requirements of 326 IAC 8-5-5.

(c) Pursuant to CP 081-4414-00005, issued on August 28, 1995,

(1) As revised by this Title V permit, the VOC input to the 8RL rotogravure printing press (EU 103) shall be limited to 1510 tons per consecutive 12-month period, with compliance determined at the end of each month.

(2) The 8RL rotogravure press (EU 103) shall be enclosed in a permanent total enclosure. This enclosure shall meet the following conditions:

(A) Any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each VOC emitting point.

(B) The total area of all natural draft openings (NDO's) shall not exceed 5% of the surface area of the enclosure's four walls, floor, and ceiling.

(C) The average facial velocity (FV) of air through all natural draft openings (NDO's) shall be at least 3,600 m/hr (200 feet per minute). The direction of air through all NDO's shall be into the enclosure.

(D) All VOC emissions must be captured and contained for discharge through the 8RL thermal oxidizer.

(3) All access doors and windows of the 8RL enclosure whose areas were not included in the area of all natural draft openings in the original total enclosure calculation shall be closed during routine operation of the process.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) cold cleaning degreaser unit, identified as EU 102, installed in 1987, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

One (1) cold cleaning degreaser unit, identified EU 105, installed in 1995, solvent used is 40% n-methylpyrrolidone and 60% ethylene glycol monobutyl ether, agitation method used is spraying, using condenser and thermal oxidizer fueled by natural gas at a heat input rate of 24.0 MMBtu/hr as controls, exhausting to stack 11.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 2-2]

Pursuant to CP (41) 1704-00005, issued on September 22, 1988, the operation of the cold cleaning degreaser EU 102 is limited to 12 cycles per day and 350 days per consecutive 12-month period, with compliance determined at the end of each month.

D.3.2 PSD Requirements [326 IAC 2-2]

Pursuant to CP 081-4414-00005, issued on August 28, 1995, and revised by this Title V permit, the VOC PTE of the cold cleaning degreaser EU 105 combined with the VOC input limit for 8RL rotogravure press (EU 103) in Condition D.2.1(c), is necessary in order to limit the VOC PTE to less than 40 tons per year. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. Any change or modification that changes the VOC PTE of the 8RL degreaser requires prior OAQ approval.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980 (EU 102 and EU 105), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the cold cleaning degreaser EU 105 shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

SECTION D.4 FACILITY CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) 5X extrusion coater/laminator, identified as EU 201, installed in 1987, product being coated is web substrate packaging material, application method used is roll coating, exhausting to stack 21. EU 201 consists of the following units: 1) One (1) extrusion laminator; 2) One (1) coating/adhesive lamination deck; 3) One (1) coating deck; 4) Two (2) coating station dryers.

One (1) 6X extrusion coater/laminator, identified as EU 204, installed in 1996, product being coated is web substrate packaging material, application method used is roll coating, using thermal oxidation as control which is fueled by natural gas at a heat input rate of 8.7 MMBtu/hr exhausting to stack 13. EU 204 consists of the following units: 1) Two (2) extrusion laminators; 2) Two (2) coating/adhesive lamination stations, identified as No. 1 and No. 2, each utilizing a gravure cylinder application system, each with a permanent total enclosure capture system, each coating a maximum of 43.2 million (MM) square inches per hour; 3) Two (2) coating/adhesive lamination station dryers, each rated at 1.5 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 PSD Requirements [326 IAC 2-2]

(a) VOC input to the 6X extrusion coater/laminator (EU 204) shall be limited to 1999 tons per consecutive twelve (12) month period, with compliance determined at the end of each month.

(b) VOC emissions from the 6X extrusion coater/laminator (EU 204) shall be controlled by the 8RL thermal oxidizer with an overall efficiency of 98%. This condition satisfies the requirements of 326 IAC 8-1-2 and 326 IAC 8-2-5.

This limits potential VOC emissions from the 6X extrusion coater/laminator (EU 204) to less than 40 tons per consecutive twelve (12) month period. Therefore, Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2, are not applicable. Any change or modification that changes the potential VOC emissions of the 6X extrusion coater/laminator (EU 204) requires prior OAQ approval.

D.4.2 Volatile Organic Compound (VOC) Emissions Limitations [326 IAC 8-2-5] [326 IAC 8-1-2]

(a) VOC input to the 5X extrusion coater/laminator (EU 201) shall be less than 25 tons per consecutive 12-month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per year. Compliance with this limit makes 326 IAC 8-2-5 (Paper Coating Operations) not applicable.

(b) Pursuant to 326 IAC 8-2-5(b), the Permittee shall not cause, allow, or permit the discharge into the atmosphere any volatile organic compounds (VOC) in excess of 2.9 pounds VOC per gallon of coating excluding water delivered to the coating applicator from the 6X coating line (EU 204).

The following conditions apply to the 6X coating line (EU 204) and the 8RL thermal oxidizer when non-compliant coatings are being used:

(c) Pursuant to 326 IAC 8-1-2(b), VOC emissions from the 6X coating line (EU 204) shall be limited to less than 4.8 pounds of VOC per gallon of coating solids. This equivalent limit was determined by using the following equation:

$$E = L / (1 - L/D)$$

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Sonoco Flexible Packaging, Inc.
Address City IN Zip: 6502 South U.S., Highway 31, Edinburgh, IN 46124
1st Administrative Amendment No.: 081-17977
Plt ID: 081-00005
Reviewer: Aida De Guzman
Date Application Received: July 24, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.7	76.2

thermal oxidizer

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.3	0.0	3.8	0.2	3.2

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 7/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.